



*CJ-23-2780*  
*Banner*  
 FILED IN DISTRICT COURT  
 OKLAHOMA COUNTY

IN THE DISTRICT COURT FOR OKLAHOMA COUNTY  
 STATE OF OKLAHOMA

MAY 15 2023

RICK WARREN  
 COURT CLERK

**CJ-2023-2780**

TIM AND JAMIE BLEYTHING,

Plaintiffs,

V.

NORTH AMERICAN VAN LINE, INC.; and,  
 A-1 FREEMAN MOVING & STORAGE, LLC.,

Defendants.

Case No.: CJ-2023-\_\_\_\_\_

**JURY TRIAL DEMANDED  
 ATTORNEY LIEN CLAIMED**

**PETITION**

Plaintiffs, Tim and Jamie Bleything (the “Bleythings” and/or “Plaintiffs”), for their causes of action against Defendants, North American Van Lines, Inc. (“North American”) and A-1 Freeman Moving & Storage, LLC. (“A-1”) (collectively “Defendants”), allege and state, as follows:

1. The Bleythings are residents of Florida.
2. Upon information and belief, North American is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Fort Wayne, Indiana.
3. Upon information and belief, North American conducts extensive business in the State of Oklahoma and Oklahoma County.
4. Upon information and belief, A-1 is a limited liability company organized and existing under the laws of the State of Oklahoma with its principal place of business in Oklahoma County, Oklahoma.
5. Upon information and belief, the events giving rise to this litigation occurred in Oklahoma County, State of Oklahoma.
6. Venue and jurisdiction are proper in this judicial district.

7. In 2021, the Bleythings resided in Edmond, Oklahoma.

8. Sometime September 2021, the Bleythings purchased a home in St. Augustine, Florida, which necessitated moving their personal property across the country. As a result, the Bleythings were required to hire a professional moving service to effectuate their move.

9. The Bleythings entered into an agreement with Defendants, wherein Defendants agreed to move certain personal property belonging to the Bleythings from their residence in Edmond, Oklahoma to their recently purchased residence located in St. Augustine.

10. The personal property belonging to the Bleythings consisted, in part, of collectible items, which had significant monetary and sentimental value.

11. On or around September 7, 2021, Defendants began the process of loading and transporting the Bleythings' personal property to the Bleythings' St. Augustine home.

12. On or around September 16, 2021, Defendants completed delivery of the Bleythings' personal property. The Bleythings were charged approximately \$37,484.15 for packing and transportation services provided by Defendants.

13. Upon delivery of their personal property, the Bleythings discovered that approximately eighteen items of personal property had been broken or destroyed while in the possession of Defendants.

14. The Bleythings further discovered that Defendants had failed to deliver numerous bottles of rare liquor, which were valued at over \$1,300.00.

15. The Bleythings have sustained significant damage, including but not limited to property damage, in an amount in excess of \$18,589.00.

**COUNT I – NEGLIGENCE**

16. The Bleythings adopt and reallege all previous paragraphs herein.

17. Defendants were negligent in failing to use reasonable care in transporting the Bleythings personal property from their home in Edmond, Oklahoma to their new residence in St. Augustine, Florida.

18. As a direct result of Defendants' negligence, the Bleythings have sustained damages, including but not limited to property damage in the amount in excess of \$18,589.00.

WHEREFORE, Plaintiffs, Tim and Jamie Bleything, pray this Court enter judgement on their claims against Defendants, North American and A-1, for damages sought in an amount in excess of \$75,000.00, together with costs, interests, attorneys' fees, and such other relief as the Court deems appropriate.

**COUNT II – CONVERSION**

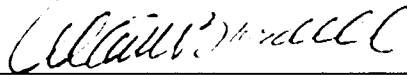
19. The Bleythings adopt and reallege all previous paragraphs herein.

20. Defendants intentionally diverted the Bleythings personal property, including but not limited to numerous bottles of rare liquor for their own personal benefit.

21. As a result of Defendants' unauthorized diversion of the Bleythings personal property, the Bleythings have sustained damages in an amount in excess of \$75,000.00.

WHEREFORE, Plaintiffs, Tim and Jamie Bleything, pray this Court enter judgment on their claims against Defendants, North American and A-1, for damages sought in an amount in excess of \$75,000.00, together with costs, interests, attorneys' fees, punitive damages, and such other relief as the Court deems appropriate.

Respectfully submitted,



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